PHASE I ENVIRONMENTAL SITE ASSESSMENT

Industrial Buildings
11630 - 11700 Burke Street
Santa Fe Springs, California 90670

Prepared for:

Mr. William Palley
1722 Malcom Avenue, Suite 202
Los Angeles, CA 90024

Prepared by:

AIG Consultants, Inc.
3 Embarcadero Center, Suite 301
San Francisco, California 94111

Mr. Greg M. Barats, R. E. A.
Environmental Consultant

Mr. Douglas P. Imperato, R. G., R. E. A.
Environmental Consultant

Date of Report: June 30, 1994

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ENVIRONMENTAL SITE ASSESSMENT
AIG Consultants, Inc.
3 Embarcadero Center
San Francisco, California 94111

June 30, 1994

Mr. William Palley
1722 Malcom Avenue, Suite 202
Los Angeles, CA 90024

Re: Phase I Environmental Assessment, Industrial Buildings at 11630 - 11700 Burke Street, Santa Fe Springs, California 90670

Mr. Palley:

AIG Consultants, Inc., has completed a Phase I Environmental Assessment of the above-referenced property. The findings of our work, together with conclusions and recommendations, are presented in the attached report.

It has been a pleasure to serve you. We will be happy to answer any questions concerning the report and look forward to being of continued service. Please feal free to contact me at (805) 963-2399 or Greg Barats at (415) 445-2981 if you have any questions or comments regarding this report.

Sincerely,

AIG CONSULTANTS, INC.

Douglas Imperato

Mr. Douglas P. Imperato, R. G., R. E. A.
Environmental Consultant

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INDUSTRIAL BUILDINGS, SANTA FE SPRINGS, CA

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1.0 EXECUTIVE SUMMARY

AIG Consultants, Inc. (AIGC), at the request of Mr. William Palley, conducted a Phase I Environmental Site Assessment of industrial buildings at 11630 - 11700 Burke Street in Santa Fe Springs, California (the Site). AIGC personnel performed a Site inspection on June 28, 1994. The purpose of this assessment is to identify, to the extent feasible, recognized environmental conditions in connection with the property. Tasks to meet this objective include: 1) a visual inspection of the Site, 2) research of historical aerial photographs to determine previous use of the Site, 3) determination of adjacent land uses, 4) review of applicable regulatory databases and federal, state, and local government records to identify potential environmental liabilities resulting from past activities at the Site and vicinity, 5) interviews with knowledgeable personnel, and 6) to create a photographic record of existing Site conditions.

The current owner of the Site is Mr. William Palley of Encino, California. The Site is divided into two parcels, and east and a west parcel. The east parcel is presently vacant, and the west parcel is leased to Talco Plastics, Inc. The Site includes about 8.5 acres with several buildings, and is located in an urban area, in a mixed residential, commercial, and industrial neighborhood.

The Site is located on Recent alluvial deposits, and is about one mile southeast of the San Gabriel River. Ground water is located at a depth of about 60 to 70 feet below grade, with a flow direction to the southwest.

Two registered underground storage tanks (UST's) are present at the western parcel: a 12,000 gallon tank used to store diesel fuel and a 10,000 gallon tank used to store unleaded gasoline. A UST used to store waste oil, indicated on a historical plot map, may also be present on Site. It is recommended that additional investigation be conducted to determine the status of this UST.

Two "Bay Traps" or "clarifiers", approximately 8 x 2 x 5 feet deep, were used historically to store waste oil and/or solvents at the Site. They have been abandoned in-place by filling with cement. It appears that there is no documentation of the condition of the storage vessels or surrounding soils at the time of abandonment,

and it is recommended that additional investigation be performed to evaluate potential impact to soil and/or ground water.

A total of five electrical transformers are presently in use at the Site, two modern pad-mount transformers, and three older caged transformers. The electric utility company has no record of testing the transformers for potential polychlorinated biphenyls (PCB's). Although it is unlikely that the pad-mount transformers contain PCB's, it is recommended that the insulation oil of transformers be sampled and analyzed for PCB's.

A variety of hazardous or regulated materials are presently in use at the Site. Current material data safety sheets are maintained on Site. Sludge waste from washing operations at the TALCO facility and waste oil are generated regularly at the Site. It is recommended that records be maintained on Site of the quantity and the disposal of waste generated, in accordance with pertinent regulations.

A total of twenty one (21) 55-gallon drums were present at the Site at the time of the inspection. Some drums appear to be used to store waste oil, although many of the drums were unlabeled. Drums were sealed and in generally good condition. In addition, fourteen (14) containers, less than 5 gallons each, containing potentially hazardous material, are stored in sheds on the eastern parcel. It is recommended that potentially hazardous material in storage containers and 55-gallon drums be sampled, identified, and disposed in accordance with pertinent regulations.

A limited amount of potential asbestos-containing material (ACM) may be present at the Site. At the eastern parcel, potential ACM includes insulation on about 50 to 75 linear feet of two-foot diameter heating duct in the area of the small office in the northwest corner of the building. At the western parcel, potential ACM are present in insulation, floor tiles, roof felt, and heating ducts at the 3,360 square foot office building. In consideration of the age of the building and type of construction, a complete survey of all suspect ACM is recommended. Prior to any remedial action, all operations and maintenance personnel should be informed of the location of ACM and instructed in proper handling procedures. Should the building be renovated, removal of these materials should be considered.

Dark-stained soils were present at the southwest corner of the Site during the Site inspection. In addition, ponded or discharged liquids were observed historically in the vicinity of "Bay Traps" and in the central part of the southern margin of the Site. It is recommended that soils in these areas be sampled and analyzed to evaluate potential impact to soil or ground water.

Numerous facilities in the vicinity of the Site were identified in the review of state and federal environmental databases. A total of 37 sites less than 1/4 mile from the Site represent the greatest potential risk to the subject property. Additional investigation of these sites is recommended to evaluate potential off-Site environmental contamination that may have impacted the Site.

Based on the results of the Site inspection, records of the history of the Site and adjacent land use, and regulatory inquiries, there is evidence of past activity at the Site which may represent environmental risks and/or liabilities. The extent of these environmental risks could possibly be determined with further investigation. Therefore, AIGC recommends that additional investigation be performed to further evaluate the potential for impact to the soils, air, and/or ground water at the Site.

2.0 OBJECTIVES

The purpose of this Phase I Environmental Assessment is to identify, to the extent feasible, recognized environmental conditions in connection with the property, as outlined by the American Society of Testing and Materials (1993) in ASTM Designation: E 1527-93. The objective of this assessment is thus: 1) to identify areas of potential environmental risk and/or liability at the Site, 2) to determine the potential for adverse environmental conditions resulting from properties adjacent to the Site, 3) to present a narrative of observed conditions at the time of the Site inspection, and 4) to satisfy the "due diligence" requirements of the Comprehensive Environmental, Response, Compensation, and Liability Act. The following tasks were undertaken to achieve these objectives:

- conduct a visual survey of the Site and improvements to identify, by physical evidence, the presence of potential adverse environmental conditions, including toxic and/or hazardous materials, interviews with knowledgeable personnel, and creation of a photographic record;

- research existing literature and available aerial photographs which may reflect prior uses of the Site, and to identify suspect or existing environmental conditions on or adjacent to the Site;

- evaluate adjacent property use and general Site operations to determine the potential for off-Site contamination sources that may potentially impact the Site including identification of reported National Priorities List, Comprehensive Environmental Response, Compensation and Liability Act Information System sites, permitted Resource Conservation and Recovery Act facilities, Underground Storage Tank facilities, Leaking Underground Storage Tank sites, and briefly summarize the risk posed by sites identified;

- review records of local, state, and federal agencies, and fire department, to investigate past environmental incidents that may have occurred at the subject property or in the immediate area;

- identify evidence and/or visible signs of on-Site storage or disposal facilities including above-ground storage tanks, underground storage tanks, buckets, drums, ponds, pits, impoundments, waste piles, and landfills;

- identify the number and type of electric transformers in service in order to determine whether any of the transformer units contain polychlorinated biphenyls (PCB's).

3.0 INTRODUCTION

This AIGC report summarizes a Phase I Environmental Site Assessment of industrial buildings and property located at 11650 and 11700 Burke Street in Santa Fe Springs, California (the Site). The general location and orientation of the Site is shown in Figure 1, reproduced from the USGS, 7.5 minute series, Whittier quadrangle. The Site is located in an unsurveyed part of T. 2 S., R. 11 W of the San Bernadino Baseline and Meridian.

The Site covers an area of approximately 8.5 acres, and includes several building structures: one large concrete building on the eastern parcel, and several smaller metal buildings and a brick office building on the western parcel (Figure 2). The square footage and date of construction of each building is indicated in Figure 2. The ground surface around the buildings is paved with asphalt, except along the southern and eastern boundaries of the Site. Water-supply wells are not known to exist on the Site. A Southern Pacific railroad track borders the Site to the south and east. The area is a developed urban setting, in a mixed residential / commercial / industrial neighborhood.

The present owner of the Site is Mr. William Palley of Encino, California. Talco Plastics Inc. (TALCO) operates a plastic recycling facility on the western parcel of the Site that employs about 100 people. The large concrete building on the eastern parcel of the Site is presently unoccupied. A chain-link fence separates the eastern parcel from the western parcel.

A variety of hazardous and/or regulated materials are presently in use and/or storage at TALCO. These include gasoline, diesel fuel, liquid propane, oxygen, acetylene, waste oil, motor oil, and hydraulic oil. The operator maintains current Material Data Safety Sheets for these materials on Site. Waste water from Site operations is discharged directly to the municipal sewer system. Solids are caused to settle out of the waste water in a clarifier prior to discharge. Waste generated at the Site incudes sludge periodically removed from the water clarifier and waste oil.

4.0 ENVIRONMENTAL SETTING

4.1 Geography and Climate

The Site is located on the Coastal Plain of Los Angeles, a 500-square-mile coastal plain drained mainly by the Los Angeles and San Gabriel Rivers (Figure 1). The fifty-year average rainfall at the San Dimas Dam, about 20 miles northeast of the Site is 22.31 inches (California Department of Water Resources, 1991). The Site and vicinity is an urban area located in a mixed residential/commercial/industrial neighborhood. The Site is located in a flat area, at an elevation of about 150 feet above sea level. The ground surface slopes gently to the southwest, towards the San Gabriel River (Figure 1).

4.2 Hydrology and Ground Water

The Site is located about one mile southeast of the south-flowing San Gabriel River (Figure 1). Natural tributary stream channels are not present in the vicinity of the Site, as surface drainage is strongly influenced by urban development.

The Site is located in the Coastal Plain of Los Angeles County ground water basin, in the South Coast Hydrologic Study Area (California Department of Water Resources, 1980). Water well data from the Los Angeles County Department of Public Works and the California Department of Water Resources indicates that ground water at the Site is at a depth of about 60 to 70 feet below grade, or at an elevation of about 80 to 90 feet above mean sea level. Ground-water flow direction is to the southwest.

4.3 Geology

The Site is located on Recent alluvial deposits that may include alluvium, alluvial fan deposits, flood plain deposits, marsh deposits, and artificial fill (Jennings, 1962). Pleistocene nonmarine sedimentary deposits form steep slopes several miles northeast of the Site. The Site is located in an area of several known, active faults capable of producing large earthquakes.

5.0 SITE INSPECTION

AIGC personnel performed a Site inspection on June 28, 1994. A representative of TALCO accompanied AIGC personnel on a Site inspection of the TALCO property. All buildings and surrounding property areas were inspected and photographed. A summary of observations are presented below, and selected photographs are included in Appendix A.

5.1 Eastern Parcel

The eastern parcel of the Site is dominated by a large concrete building (Figure 2). The parcel includes asphalt-paved parking areas north and west of the building. The parking area on the west side of the building is fenced. Two small metal storage sheds are present along the western border of the eastern parcel. A Southern Pacific railroad track borders the parcel to the east and south. The area between the railroad tracks and the building is an unpaved soil surface.

There was no visual evidence of potential environmental concerns along the parking area north of the building. The unpaved area that borders the eastern and southern sides of the building along the railroad track contained assorted debris and trash, including a single partially filled 55-gallon drum and several piles of construction debris.

On the western side of the building, the following potential environmental risks were identified: 1) a locked pad-mounted electrical transformer located adjacent to the building to the west; 2) two partially filled 55-gallon drums adjacent to the storage sheds; 3) storage of paint, oil, and other potentially hazardous materials in fourteen containers (less than five gallons each) in and around the storage sheds; and 4) a single sealed, unlabeled, partially filled 55-gallon drum on the southwestern corner of the parking area.

In the large building on the eastern parcel, potential asbestos-containing material (ACM) may be present as wrapping on a heating duct, approximately 50-75 feet long and two-feet in diameter. Potential ACM were not identified in other areas

of the building. Other potential environmental risks were not identified in the vacant building on the eastern parcel. There was no visual evidence of drains, floor sumps, or staining on the concrete floor of the building.

5.2 Western Parcel

The western parcel of the Site includes an office building, four storage/processing buildings, a shipping/receiving building, and fuel pumps with underground storage tanks (Figure 2). All buildings are constructed of corrugated metal except the office building, which is constructed of brick. The large quantity of material stored in and around many of the buildings on Site limited the ability to inspect floors for visual evidence of drains, floor sumps, or staining. A Storm Water Pollution Prevention Plan (SWPP), including "clarifiers" and "traps" to eliminate particulate material from storm-water runoff, was recently implemented at the Site.

Potential environmental risks were not identified in the single-story brick office building which covers an area of 3,360 square feet. Based on the construction date of the building (1940), however, it is possible that ACM may be present within this building. Potential ACM may include ceiling insulation, floor tiles, roof felt, and heating ducts.

Building 1 is used primarily for bulk plastic storage. A machine shop is located on the eastern end of the building. In this area, paints, lubricants, and pressurized oxygen and acetylene canisters are used and stored. Potential ACM were not identified in Building 1.

A total of 15 partially filled 55-gallon drums were located outside of Building 1 to the east. Labels on some of these drums indicated lubricating oil, and one drum label indicated Di-2-ethylhexyl Pthalate. Most of the drums were not labeled.

An office trailer is located adjacent to southern part of building, to the west. Three large electrical power transformers are located adjacent to the south side of Building 2 on the east. Each transformer contains 220 gallons of oil. A locked box

containing a pad-mount electrical transformer is located across from these transformers, adjacent to Building 2.

Liquid propane is used to power fork lifts which are used throughout the facility. Two above-gound liquid propane storage tanks are located east of Building 1. Two additional above-ground liquid propane storage tanks are located at the southeast corner of the western parcel.

Building 2 and Building 4 are used primarily for bulk plastic storage. Potential ACM or other environmental risks were not identified in Building 2 or Building 4. Blending machines and grinding machines were located in Building 3.

A shipping/ receiving area is located on the northwest corner of the Site. Fuel pumps are located on an island southeast of the shipping/receiving area. Vent pipes and access covers for two permitted underground storage tanks were observed adjacent to the fuel-pump island.

The western and southern part of the western parcel is used primarily for bulk plastic storage. Two large out-of-service silos are stored at the southeast corner of the western lease. Out-of-service machinery and equipment is stored at the southwest corner of the Site. Four partially filled 55-gallon drums are also present in this area. The ground surface in this area is stained a dark color from an unknown liquid.

6.0 HISTORICAL REVIEW

6.1 History of Site Operations

The history of operators at the Site was determined from business license records of the City of Santa Fe Springs. Talco Plastics, Inc. has occupied the western parcel of the Site since 1983. The east parcel, which has been vacant for the past several months, was previously occupied by Master Box and Paper Company, a Division of Sunclipse, Inc., beginning in 1987. This parcel was previously occupied by Max Rouse & Sons, Inc., industrial auctioneers, beginning in 1981. Palley Supply Company, a government surplus order house, occupied the Site beginning in 1973. Globe International, Inc., a manufacturer of oil well drilling and tools, occupied the Site beginning in 1968.

6.2 Historic Aerial Photograph Review

In order to evaluate historic land use at the Site, five aerial photographs dated 1947, 1959, 1965, 1977, and 1982 were reviewed. The scale of photographs ranges from 1: 20,000 to 1: 36,000. Aerial photographs were reviewed at the Map and Imagery Laboratory at the University of California at Santa Barbara.

The 1947 photograph (at a scale of 1 : 24,000) of the Site and vicinity indicates that the buildings on the western parcel had been constructed by this time. The eastern parcel appears as undeveloped soil and grassland. Evidence of potential adverse environmental conditions at the Site were not noted on this photograph. Furrowed farmland is present north of the Site. Above-ground storage tanks and evidence of soil staining are present south and east of the property across the Southern Pacific railroad tracks.

In the 1959 photograph (at a scale of 1 : 20,000), the eastern parcel of the Site appears as partially vegetated soil. Ponded liquid of unknown composition is present adjacent to the railroad tracks on the southern part of the eastern parcel. Other evidence of potential adverse environmental conditions at the Site were not noted on this photograph. Residential structures are present across from the Site on

Burke Street. Above-ground storage tanks present southeast of the Site in the 1947 photograph are not present in this photograph.

The 1965 photograph (at a scale of 1 : 36,000) shows the Site in a similar condition as in the previous photograph. The eastern parcel appears as unvegetated soil. Evidence of potential adverse environmental conditions at the Site were not noted on this photograph. Additional homes are present across the street from the Site on Burke Street.

In the 1976 photograph (at a scale of 1 : 24,000), the large building on the eastern parcel is present. Evidence of potential adverse environmental conditions at the Site were not noted on this photograph.

In the 1982 photograph (at a scale of 1 : 24,000), the Site appears very similar to its present condition. Evidence of potential adverse environmental conditions at the Site were not noted on this photograph.

6.3 Operator Disclosure Questionnaire

Mr. William Palley of Encino, California, the present owner of the Site, completed an Environmental Risk Assessment Questionnaire (ERAQ) at the request of AIGC. The questionnaire provides an opportunity for the owner to disclose any information which may be useful in the identification of potential risks and/or liabilities at the Site. Mr. Palley's response to the ERAQ is included in Appendix B. Responses to the ERAQ indicate that the owner is not aware of potential environmental concerns at the Site, nor is aware of any conditions that might indicate potential environmental problems.

6.4 Fire Insurance Maps

A search for Sanborn fire-insurance maps of the Site was conducted by Environmental Risk Information & Imaging Services (ERIIS) for the period covering 1867 to 1990. No maps of the Site were found.

7.0 REGULATORY REVIEW

The review of federal and state environmental regulatory databases included a check of facility listings available through regulatory-agency databases to determine whether the subject property or adjacent facilities have been subject to environmental actions or review. The databases were reviewed by Environmental Risk Information & Imaging Services (ERIIS) of Alexandria, Virginia. Nine U. S. Environmental Protection Agency (USEPA) databases were reviewed: CERCLIS, DOCKET, ERNS, FINDS, NPL, RCRIS-LG, RCRIS-SG, RCRIS-TS, and TRI. In addition, eight California databases were searched: CALSITES, CORTS, HWIS, LUST, SWAT, SWIS, UST, and WDS. The ERIIS report, including radius maps, are provided in Appendix C.

The review of federal and state databases revealed that the Site is included in the California Office of Environmental Information listing of registered underground storage tanks (the UST list). The Site is not included on any other government database listing.

7.1 Federal Database Search

The Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) list is a compilation of sites which the USEPA has investigated for a release, or threatened release, of hazardous substances pursuant to the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA or Superfund Act). The ERIIS review of the CERCLIS list indicates that five sites are located within 1/4 mile of the subject property, seven sites are located between 1/4 and 1/2 mile of the subject property, and four sites are located between 1/2 and one mile of the subject property.

The Civil Enforcement DOCKET is the system for tracking civil judicial cases filed on the behalf of USEPA by the Department of Justice. This report contains information on cases from 1972 to the present. The ERIIS review of the DOCKET list indicates that no sites are located within one mile of the subject property.

The Emergency Response Notification System (ERNS) is a national computer database system that is used to store information on the sudden and/or accidental release of hazardous substances, including petroleum into the environment. The ERIIS review of the ERNS list indicates that no sites are located within 1/4 mile of the subject property, three sites are located between 1/4 and 1/2 mile of the subject property, and two sites are located between 1/2 and one mile of the subject property.

The FINDS report is a computerized inventory of all facilities that are regulated or tracked by the USEPA. The ERIIS review of the FINDS list indicates that 11 sites are located within 1/4 mile of the subject property.

The National Priorities List (NPL) is the USEPA's database of uncontrolled or abandoned hazardous waste sites identified for priority remedial action under the Superfund Act. To be included on the NPL, a site must either meet or surpass a predetermined hazard ranking systems score. The ERIIS review of the NPL list indicates that no sites are located within one mile of the subject property.

The USEPA's RCRA large generator (RCRA LG) program identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA facilities database is a compilation by the EPA of reporting facilities that generate, transport, treat, store, or dispose of hazardous waste. This database contains information on facilities that generate more than 1,000 kilograms of hazardous waste per month. The ERIIS review of the RCRA LG list indicates that three sites are located within 1/4 mile of the subject property, 15 sites are located between 1/4 and 1/2 mile of the subject property, and 28 sites are located between 1/2 and one mile of the subject property.

The USEPA's RCRA small generator (RCRA SG) program identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA facilities database is a compilation by the EPA of reporting facilities that generate, transport, treat, store, or dispose of hazardous waste. This database contains information on facilities that generate between 100 and 1,000 kilograms of hazardous waste per month. The ERIIS review of the RCRA SG list indicates that

two sites are located within 1/4 mile of the subject property, nine sites are located between 1/4 and 1/2 mile of the subject property, and 38 sites are located between 1/2 and one mile of the subject property.

The USEPA's RCRA storage and treatment (RCRA TS) program identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA facilities database is a compilation by the EPA of reporting facilities that generate, transport, treat, store, or dispose of hazardous waste. This database contains information on facilities that either treat, store, or dispose of hazardous waste. The ERIIS review of the RCRA TS list indicates that one site is located within 1/4 mile of the subject property, two sites are located between 1/4 and 1/2 mile of the subject property, and no sites are located between 1/2 and one mile of the subject property.

The USEPA maintains a Toxic Release Inventory (TRI) database that contains information of the industrial release and/or transfer of toxic chemicals. The ERIIS review of the TRI list indicates that four sites are located within 1/4 mile of the subject property, seven sites are located between 1/4 and 1/2 mile of the subject property, and 11 sites are located between 1/2 and one mile of the subject property.

7.2 State Database Search

CALSITES is a database maintained by the California EPA of hazardous waste and substances sites. Sites formerly listed in the Abandoned Sites Project Information System (ASPIS) and the Bond Expenditure Plan (BEP) are included in this database. The ERIIS review of the CALSITES list indicates that eight sites are located within 1/4 mile of the subject property, 26 sites are located between 1/4 and 1/2 mile of the subject property, and 46 sites are located between 1/2 and one mile of the subject property.

The California Department of Toxic Substances Control maintains the CORTS database which contains information on hazardous waste and substances sites in California. The ERIIS review of the CORTS list indicates that seven sites are located within 1/4 mile of the subject property, four sites are located between 1/4 and 1/2

mile of the subject property, and 16 sites are located between 1/2 and one mile of the subject property.

The California EPA maintains the HWIS database of hazardous-waste generators and hazardous-waste treatment storage and disposal facilities pursuant to the Hazardous Waste Management Act of 1976. The ERIIS review of the HWIS list indicates that six sites are located within 1/4 mile of the subject property, 16 sites are located between 1/4 and 1/2 mile of the subject property, and 51 sites are located between 1/2 and one mile of the subject property.

The California Office of Environmental Information maintains a comprehensive listing of all registered underground storage tanks (UST's) within the state. The ERIIS review of the UST list reveals that the Site contains registered underground storage tanks. The review also indicates that 14 sites are located within 1/4 mile of the subject property, 19 sites are located between 1/4 and 1/2 mile of the subject property, and 52 sites are located between 1/2 and one mile of the subject property.

The California State Water Resources Control Board, in cooperation with the Office of Emergency Services, compiles lists of all current and former leaking underground storage tanks in the LUST database. The ERIIS review of the LUST list indicates that seven sites are located within 1/4 mile of the subject property, two sites are located between 1/4 and 1/2 mile of the subject property, and 22 sites are located between 1/2 and one mile of the subject property.

The California Solid Waste Assessment Test (SWAT) report contains information pertaining to solid waste landfills from which there is a known migration of hazardous waste. The ERIIS review of the SWAT list indicates that no sites are located within 1/4 mile of the subject property, one site is located between 1/4 and 1/2 mile of the subject property, and one site is located between 1/2 and one mile of the subject property.

The California Integrated Waste Management Board maintains an inventory list of open, closed, and inactive solid-waste disposal facilities and transfer stations

pursuant to the Solid Waste Management and Resource Recovery Act of 1972. The Solid Waste Information System (SWIS) lists locations of disposal facilities obtained through permit applications. The ERIIS review of the SWIS list indicates that no sites are located within one mile of the subject property.

The California State Water Resources Control Board maintains a database for the California Waste Discharge System (WDS). This database contains information on facilities that have been issued waste discharge permits for the release of waste water or hazardous waste into either an injection well or surface water. The ERIIS review of the WDS list indicates that no sites are located within 1/4 mile of the subject property, one site is located between 1/4 and 1/2 mile of the subject property, and one site is located between 1/2 and one mile of the subject property.

7.3 State and Local Regulatory Agency Record Review

Records of state and local regulatory agencies were reviewed to identify potential environmental risks and/or liabilities which may have resulted from previous activity at the Site. Agencies contacted include the California Department of Conservation, the California Department of Water Resources, Regional Water Quality Control Board, the South Coast Air Quality Management District, the Los Angeles County Department of Public Works, the Los Angeles County Department of Health Services, the Santa Fe Springs Fire Department, and the Santa Fe Springs Building Department. A list of agencies and pertinent contact information is included in Table 1. The California Department of Conservation and the California Department of Water Resources provided information on the environmental setting at the Site (see Section 4.0).

7.3.1 Regional Water Quality Control Board, Los Angeles Region

Regional Water Quality Control Board (RWQCB) personnel indicated that although records of several sites in the vicinity of the subject property were on file, the RWQCB did not have a record of the subject property. It was recommended that local agencies be contacted.

7.3.2 South Coast Air Quality Management District

A review of records of the South Coast Air Quality Management District (AQMD) through March, 1990 indicated that there were eight permits in effect at the Site. A list of these permits is included in Appendix D. A description of other AQMD activity at the Site prior to March, 1990 are discussed below. The AQMD was contacted in June, 1994 as part of this Phase I investigation to update any additional AQMD activity, although a response was not received prior to completion of this report.

The AQMD had records of two complaints concerning the subject property. Both of these complaints were recorded in 1987 and were related to fires. In January, 1987, Complaint No. 4613 was recorded in response to burning plastic at the Site. In July, 1987, Complaint No. 8726 was recorded in response to a structure fire.

The AQMD issued a violation to the operator of the Site in August, 1993 for failure to obtain a Permit to Operate extruder equipment. A penalty of $500 was levied. A copy of the record of this violation is included in Appendix D.

7.3.3 Los Angeles County Department of Public Works

The Los Angeles County Department of Public Works (DPW) has records of the Talco Plastics Inc. (TALCO) facility at 11650 Burke St. and the Palley Supply, Inc. (PALLEY) facility at 11700 Burke St. These are summarized below, and pertinent documents are included in Appendix D.

In response to a request by the DPW, TALCO applied for permits for two underground storage tanks (UST's) at the Site: a 12,000 gallon tank for diesel fuel and a 10,000 gallon tank used for unleaded gasoline. Blueprint plans indicate the presence of a smaller waste oil UST located in the vicinity of the other UST's. Permits were issued originally in December, 1988, and permit renewals were issued in December, 1989 and July, 1993. A copy of the most recent permit application is included in Appendix D.

In February, 1970, Globe Oil Tools Company (GLOBE) received from the Los Angeles County Engineer a Notice of Violation for discharge of liquid waste to the ground surface. An analysis of the waste discharge indicated high levels of dissolved solids. Oil and grease in the waste water was not analyzed. In March, 1970, GLOBE sent a letter to the County Engineer describing a proposed industrial Waste Disposal System for the Site. A permit application was submitted in May, 1970, and Industrial Waste Disposal Permit No. 4485 was issued by the City Engineer to GLOBE in August, 1971.

In February, 1978, PALLEY received from the City of Santa Fe Springs a Notice of Violation for discharge of industrial waste water to the public sewer without a valid permit. In March, 1978, PALLEY submitted an application for an industrial Waste Disposal Permit, and received Permit No. 6112 in December, 1978 from the Sanitary District of Los Angeles County. In October, 1984, Permit No. 6112 was voided because the company was no longer present at the Site.

In August, 1988, in response to inquiries by the Los Angeles County Department of Health Services, the DPW referred concerns about the presence of the two underground brick "clarifiers" or vaults at the Site to the Santa Fe Springs Fire Department (SFSFD). The clarifiers were subsequently abadoned in-place by filling with cement. Documentation of the condition of the storage vessels or surrounding soils at the time of abandonment was not present in regulatory agency files.

7.3.4 Los Angeles County Department of Health Services

A request for a search of records at the Los Angeles County Department of Health Services (DHS) by AIGC in March, 1990, indicated that the DHS had a Contingency Plan and Emergency Procedures on file for the TALCO facility. The DHS was contacted in June, 1994 as part of this Phase I investigation to update any additional DHS activity, although a response was not received prior to completion of this report.

In February, 1970, Globe Oil Tools Company (GLOBE) received from the Los Angeles County Engineer a Notice of Violation for discharge of liquid waste to the ground surface. An analysis of the waste discharge indicated high levels of dissolved solids. Oil and grease in the waste water was not analyzed. In March, 1970, GLOBE sent a letter to the County Engineer describing a proposed industrial Waste Disposal System for the Site. A permit application was submitted in May, 1970, and Industrial Waste Disposal Permit No. 4485 was issued by the City Engineer to GLOBE in August, 1971.

In February, 1978, PALLEY received from the City of Santa Fe Springs a Notice of Violation for discharge of industrial waste water to the public sewer without a valid permit. In March, 1978, PALLEY submitted an application for an industrial Waste Disposal Permit, and received Permit No. 6112 in December, 1978 from the Sanitary District of Los Angeles County. In October, 1984, Permit No. 6112 was voided because the company was no longer present at the Site.

In August, 1988, in response to inquiries by the Los Angeles County Department of Health Services, the DPW referred concerns about the presence of the two underground brick "clarifiers" or vaults at the Site to the Santa Fe Springs Fire Department (SFSFD). The clarifiers were subsequently abadoned in-place by filling with cement. Documentation of the condition of the storage vessels or surrounding soils at the time of abandonment was not present in regulatory agency files.

7.3.4 Los Angeles County Department of Health Services

A request for a search of records at the Los Angeles County Department of Health Services (DHS) by AIGC in March, 1990, indicated that the DHS had a Contingency Plan and Emergency Procedures on file for the TALCO facility. The DHS was contacted in June, 1994 as part of this Phase I investigation to update any additional DHS activity, although a response was not received prior to completion of this report.

Records of the DPW include some records of DHS activity at the Site. In July, 1988, PALLEY was prosecuted for transport and disposal of hazardous waste. The penalties totaled $43,000. Pertinent documentation is included in Appendix D.

7.3.5 Santa Fe Springs Fire Department

The Santa Fe Springs Fire Department (SFSFD) has indicated that the TALCO facility has attained compliance with the Conditional Use Permit for the Site. In recent months, the TALCO facility has met conditions that include installation of a sand and grease interceptor for wastewater discharges, completion of an Air Toxicity Survey Report, and approval of a Storm Water Pollution Prevention Plan.

The SFSFD has an updated Hazardous Material Business Plan on file for the TALCO facility. Hazardous or regulated material used or stroed on Site include gasoline, diesel fuel, liquid propane gas, acetylene, oxygen, waste oil, lubricating oil, and detergents.

A permit has been issued a permit to TALCO for liquid propane gas storage and flammable combustible liquids and tanks. A copy of this permit is included in Appendix D.

In September, 1984, PALLEY reported "liquid bubbling out of the ground and flowing across the property" just outside of the south fence line. The problem resulted from a pipeline leaking caustic ammonium hydroxide and salt from the Southern California Chemical Company (see Appendix D). There is no indication of further action resulting from this leak.

Fires at the Site were reported in December, 1984, January, 1987, July, 1987, and March, 1992. A summary of SFSFD activity at the Site is provided in a Fire Marshal report of May, 1993, included in Appendix D. Other pertinent SFSFD documents are also included Appendix D.

8.0 CONCLUSIONS

1. Underground Storage Tanks and Underground "Clarifiers"

Two registered underground storage tanks (UST's) are present at the western parcel: a 12,000 gallon tank used for diesel fuel and a 10,000 gallon tank used for unleaded gasoline. Blueprint plans on file at the Santa Fe Springs Fire Department indicate the presence of an additional waste oil tank adjacent to the fuel tanks. This tank is not registered, there was no field evidence of this tank recognized during the Site inspection, and representatives of the operator had no knowledge of the tank. It is recommended that additional investigation be conducted to determine if this tank is present at the Site.

Two "Bat Traps" or "clarifiers", approximately 8 x 2 x 5 feet deep, were used historically to store waste oil and/or solvents at the Site. They have been abandoned in-place by filling with cement. It appears that there is no documentation of the condition of the storage vessels or surrounding soils at the time of abandonment, and it is recommended that additional investigation be performed to evaluate potential impact to soil and/or ground water.

2. PCB's

A total of five electrical transformers are presently in use at the Site, two modern pad-mount transformers, and three older caged transformers. The electric utility company has no record of testing the transformers for potential polychlorinated biphenyls (PCB's). Although it is unlikely that the pad-mount transformers contain PCB's, it is recommended that the insulation oil of transformers be sampled and analyzed for PCB's.

3. Hazardous Materials and Waste Generated on Site

A variety of hazardous or regulated materials are presently in use, or stored at the Site. These include gasoline, diesel fuel, liquid propane gas, acetylene, oxygen, waste oil, lubricating oil, and detergents. Current material data safety sheets are maintained on Site.

A total of twenty one (21) 55-gallon drums, partially filled with unknown contents, were identified during the Site inspection. In addition, fourteen (14) containers, less than 5 gallons each, containing potentially hazardous material, are stored in storage sheds on the eastern parcel. It is recommended that potentially hazardous material in storage containers and drums be identified and disposed in accordance with pertinent regulations.

4. Asbestos

A limited amount of potential asbestos-containing material (ACM) may be present at the Site. At the eastern parcel, potential ACM includes insulation on a heating duct about 50 to 75 feet long and two-foot in diameter in the northwest corner of the building. At the western parcel, potential ACM are present in insulation, floor tiles, roof felt, and heating ducts at the 3,360 square foot office building.

A complete survey of all suspect ACM is recommended. Prior to any remedial action, all operations and maintenance personnel should be informed of the location of ACM and instructed in proper handling procedures. Should the building be renovated, removal of these materials should be considered.

5. Potential Soil Contamination

Dark-stained soils were present at the southwest corner of the Site during the Site inspection. In addition, ponded or discharged liquids were observed historically in the vicinity of "Bay Traps" and in the central part of the southern margin of the Site. It is recommended that soils in these areas be sampled and analyzed to evaluate potential impact to soil or ground water.

6. Site Vicinity

Numerous facilities in the vicinity of the Site were identified in the review of state and federal environmental databases. These include facilities on the CERCLIS, TRI, RCRIS, ERNS, FINDS, UST, LUST, CALSITES, HWIS, WDS, CORTS, and SWAT lists. A total of 37 sites that are on the CERCLIS, TRI, LUST, CALSITES, HWIS, and CORTS list and are less than 1/4 mile from the Site, represent the greatest potential risk to the subject property. Those sites located to the northeast of the subject property, up gradient in regards to ground-water flow direction, are of greatest concern. Additional investigation of these sites is recommended to evaluate potential off-Site environmental contamination that may have impacted the Site.

7. Regulatory Compliance

Various operators at the Site have received violations for a variety of problems. It is recommended that operations at the Site be regularly reviewed by qualified personnel to ensure compliance with all federal, state, and local regulatory-agency requirements.

9.0 LIMITATIONS

AIGC does not assume responsibility for the discovery and elimination of hazards which could possibly cause accidents, injuries, or damage. Compliance with submitted recommendations and/or suggestions in no way assures elimination of hazards or the fulfillment of your obligation as may be required by any local, state, or federal laws or any modification or changes thereto. In many cases, federal, state, or local codes/regulations require the prompt reporting to relevant authorities of a release of hazardous material. It is the responsibility of the property owner to notify authorities of any conditions which are in violation of current legal standards.

Factual information regarding operations, conditions, and test data has been obtained in part from the property owner and has been assumed by AIGC to be correct and complete. Since the facts stated in this report are subject to professional interpretation, they could result in differing conclusions. In addition, the findings and conclusions contained in this report are based on various quantitative and qualitative factors as they presently exist. Therefore, if the recommendations made in this report are not implemented within a reasonable period of time, there can be no assurance that intervening factors will not arise which will affect the conclusions reached herein. AIGC is not responsible for conclusions, opinions, or recommendations made by others based upon the data presented in this report.

10.0 REFERENCES CITED

American Society of Testing and Materials, 1993, Standard practice for environmental site assessments: Phase I environmental site assessment process: Designation E 1527-93, 24 p.

California Department of Water Resources, 1975, California's Ground Water: Bulletin 118, 135 p.

California Department of Water Resources, 1980, Ground Water Basins in California: Bulletin 118-80, 73 p.

California Department of Water Resources, 1988, Hydrologic Data 1985, Volume V, Southern California: Bulletin 130-85, 208 p.

California Department of Water Resources, 1991, Water Conditions in California: Bulletin 120-91, 41 p.

Jennings, C. W., 1971, Geologic Map of California, Long Beach Sheet: Division of Mines and Geology, scale 1:250,000.

Jennings, C. W., 1975, Fault map of California, Geologic Data Map No.1, Division of Mines and Geology, scale 1:750,000.

Norris, R. N., 1992, Geology of California, Second edition, Wiley and Sons.